

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHER DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

**JAMES BUTCHER
Debtor**

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§
§
§

Case No. 23-34075-H4-13

Chapter 13

DEBTOR'S MOTION TO CONVERT TO CHAPTER 11 SUBPART V

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN TWENTY-ONE (21) DAYS FROM THE DATE THAT THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED; IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

James Butcher, the Debtor in the above case, files this motion to convert his case to a chapter 11 subpart V case pursuant to section Bankruptcy Code section 1307(d).

Dated: January 4, 2024

Respectfully submitted,

/s/Nikie Marie Lopez-Pagan

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Proposed Counsel for Debtor in Chapter 11 Case

CERTIFICATE OF SERVICE

I certify that on January 4, 2024, I caused a copy of the above document to be delivered to the Electronic Filing System of the United States Bankruptcy Court for the Southern District of Texas.

I further certify that on or about January 5, 2024, I caused a copy of the following described documents to be served by U.S. Mail, postage prepaid to all parties on the attached mailing matrix. Documents served were (1) Motion to Convert to Chapter 11 Subpart V, (2) Proposed Order on Motion to Convert to Chapter 11 Subpart V.

/s/Nikie Marie Lopez-Pagan
Nikie Marie Lopez-Pagan
